

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

FOX VALLEY & VICINITY CONSTRUCTION)	
WORKERS WELFARE FUND, <i>et al.</i> ,)	
)	CIVIL ACTION
Plaintiffs,)	
)	NO. 18 C 4748
vs.)	
)	JUDGE ELAINE E. BUCKLO
DE GRAF CONCRETE CONSTRUCTION, INC.,)	
an Illinois corporation,)	
)	
Defendant.)	

MOTION FOR ENTRY OF DEFAULT AND JUDGMENT

NOW COME Plaintiffs, by their attorneys, and move for entry of judgment by default against Defendant, DE GRAF CONCRETE CONSTRUCTION, INC., an Illinois corporation, in the total amount of \$68,041.66, plus Plaintiffs' court costs and reasonable attorneys' fees in the amount of \$1,115.00.

On July 17, 2018, the Summons and Complaint was served on the Registered Agent (by tendering a copy of said documents to Cindy Tait) at his place of business (a copy of the Summons and Affidavit of Service is attached hereto). Therefore, Defendant's answer was due on August 7, 2018. As Defendant has failed to timely answer the Complaint, Plaintiffs respectfully request entry of default and judgment.

/s/ Cecilia M. Scanlon

CERTIFICATE OF SERVICE

The undersigned, an attorney of record, hereby certifies that she electronically filed the foregoing document (Motion for Entry of Default and Judgment) with the Clerk of Court using the CM/ECF system, and further certifies that I have mailed the above-referenced document by United States Mail to the following non-CM/ECF participant on or before the hour of 5:00 p.m. this 16th day of August 2018:

Mr. Michael G. Pirron, Registered Agent/President
De Graf Concrete Construction, Inc.
300 Alderman Avenue
Wheeling, IL 60090

/s/ Cecilia M. Scanlon

Cecilia M. Scanlon
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